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7 CLERK, U.S. DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9 BY _____ DEPUTY CLERK
10

11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA
13

14 WORDTECH SYSTEMS, INC.,
15 a California corporation,
16

Plaintiff,

17 v.
18 INTEGRATED NETWORK SOLUTIONS,
19 INC., a Nevada corporation, et al.,
20

Defendants.

Case No.: 2:04-cv-01971-MCE-EFB

JOINT VERDICT FORM

21 We, the jury, unanimously find as follows:
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1 **I. INFRINGEMENT**2 **A. Defendant INSC**

3 Has WordTech proved by a preponderance of evidence that Robocopier 8000
4 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No"
5 answer is for INSC.)

	Claim 1		Claim 2		Claim 3		Claim 12		Claim 13	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 14		Claim 15		Claim 16	
	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X	

18 Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2,
19 3, 12, 13, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that Robocopier 600 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No" answer is for INSC.)

	Claim 12		Claim 13		Claim 14		Claim 15		Claim 16	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 12, 13, 14, 15, 16.

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Has WordTech proved by a preponderance of evidence that the Robocopier 8000

infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for INSC.)

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	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

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	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 600 infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for INSC.)

	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2.

Has WordTech proved by a preponderance of evidence that the Robocopier 600 infringes Patent 932? (A "Yes" answer is for WordTech and a "No" answer is for INSC)

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2.

B. Defendant Hamid Assadian

Has WordTech proved by a preponderance of evidence that Robocopier 8000 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

	Claim 1		Claim 2		Claim 3		Claim 12		Claim 13	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 14		Claim 15		Claim 16	
	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 3, 12, 13, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that Robocopier 600 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

	Claim 12		Claim 13		Claim 14		Claim 15		Claim 16	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 12, 13, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 8000 infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 600 infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 8000 infringes Patent 932 ? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian)

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2.

Has WordTech proved by a preponderance of evidence that the Robocopier 600 infringes Patent 932 ? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian)

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2.

C. Defendant Nasser Khatemi

Has WordTech proved by a preponderance of evidence that Robocopier 8000 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No" answer is for Nasser Khatemi.)

	Claim 1		Claim 2		Claim 3		Claim 12		Claim 13	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 14		Claim 15		Claim 16	
	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X	

1 Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2,
 2 3, 12, 13, 14, 15, 16.

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5 Has WordTech proved by a preponderance of evidence that Robocopier 600
 6 infringes the following claims of Patent 298? (A "Yes" answer is for WordTech and a "No"
 7 answer is for Nasser Khatemi.)

	Claim 12		Claim 13		Claim 14		Claim 15		Claim 16	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

14 Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 12,
 15 13, 14, 15, 16.

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18 Has WordTech proved by a preponderance of evidence that the Robocopier 8000
 19 infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for Nasser
 20 Khatemi.)

	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

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	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 600 infringes Patent 198 ? (A "Yes" answer is for WordTech and a "No" answer is for Nasser Khatemi.)

	Claim 1		Claim 2		Claim 6		Claim 7		Claim 8	
	Yes	No								
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 9		Claim 10		Claim 11		Claim 12		Claim 14	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X		X		X		X	
(B) Contributing to infringement in the U.S.	X		X		X		X		X	

	Claim 15		Claim 16	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16.

Has WordTech proved by a preponderance of evidence that the Robocopier 8000 infringes Patent 932 ? (A "Yes" answer is for WordTech and a "No" answer is for Nasser Khatemi)

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2.

1 Has WordTech proved by a preponderance of evidence that the Robocopier 600
2 infringes Patent 932 ? (A "Yes" answer is for WordTech and a "No" answer is for Nasser
3 Khatemi)

	Claim 1		Claim 2	
	Yes	No	Yes	No
(A) Inducing Infringement in the U.S.	X		X	
(B) Contributing to infringement in the U.S.	X		X	

10
11 Please answer "Yes" or "No" for each of A and B as it pertains to each of the Claims 1, 2
12

13 II. **Infringement Detail**

14 If you found infringement of at least one valid claim of either Patent 298, Patent 198, or
15 Patent 932, answer the question below for the appropriate patent.

16 Has WordTech proved that any valid claim of these patents was infringed by INSC? (A
17 "Yes" answer is for WordTech and a "No" answer is for INSC.)

18 Patent 298: Yes X No _____
19 Patent 198: Yes X No _____
20 Patent 932: Yes X No _____

21
22 Has WordTech proved that any valid claim of these patents was infringed by Hamid
23 Assadian? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

24 Patent 298: Yes X No _____
25 Patent 198: Yes X No _____
26 Patent 932: Yes X No _____

1 Has WordTech proved that any valid claim of these patents was infringed by
2 Nasser Khatemi? (A "Yes" answer is for WordTech and a "No" answer is for Nasser Khatemi.)

3 Patent 298: Yes X No _____

4 Patent 198: Yes X No _____

5 Patent 932: Yes X No _____

6

7 **III. DAMAGES**

8 If you found infringement of at least one valid claim, please answer the following
9 questions regarding your damages award:

10 Do not provide the answer for a patent in which you do not find at least one valid and
11 infringed claim.

12 A. What amount of damages has WordTech proved by a preponderance of evidence?

13 Patent 298: Amount: \$ 150,000.00

14 (If the above amount was based upon a running royalty rather than a lump
15 sum, what percentage or per unit rate did you use? _____)

16 Patent 198: Amount: \$ 50,000.00

17 (If the above amount was based upon a running royalty rather than a lump
18 sum, what percentage or per unit rate did you use? _____)

19 Patent 932: Amount: \$ 50,000.00

20 (If the above amount was based upon a running royalty rather than a lump
21 sum, what percentage or per unit rate did you use? _____)

1 **IV. WILLFULLNESS**

2 If you found infringement of at least one valid claim of either Patent 298, Patent 198, or
3 Patent 932, answer the question below for the appropriate patent.

4 Has WordTech proved that any valid claim of these patents was willfully infringed by
5 INSC? (A "Yes" answer is for WordTech and a "No" answer is for INSC.)

6 Patent 298: Yes X No _____

7 Patent 198: Yes X No _____

8 Patent 932: Yes X No _____

9

10 Has WordTech proved that any valid claim of these patents was willfully infringed by
11 Hamid Assadian? (A "Yes" answer is for WordTech and a "No" answer is for Hamid Assadian.)

12 Patent 298: Yes X No _____

13 Patent 198: Yes X No _____

14 Patent 932: Yes X No _____

15

16 Has WordTech proved that any valid claim of these patents was willfully infringed by
17 Nasser Khatemi? (A "Yes" answer is for WordTech and a "No" answer is for Nasser Khatemi.)

18 Patent 298: Yes X No _____

19 Patent 198: Yes X No _____

20 Patent 932: Yes X No _____

21

22 **Please date and sign the Verdict Form and return it to the Court.**

23 Dated: 11/17/08


John F. Lally
Foreperson